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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	
)	
SCHAHIN II FINANCE COMPANY (SPV))	
LIMITED, ¹)	Case No. 18- 12964 (MEW)
)	
)	
Debtor in a Foreign Proceeding.)	Chapter 15
)	

**DECLARATION OF KELLY D. CURTIN REGARDING SERVICE OF
NOTICE AND VERIFIED PETITION FOR RECOGNITION OF
FOREIGN MAIN PROCEEDING AND CERTAIN RELATED RELIEF**

I, KELLY D. CURTIN, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am an attorney at the firm of Porzio, Bromberg & Newman, P.C. ("Porzio"), which maintains offices at 156 West 56th Street, New York, New York 10019, among other locations.

The September 27, 2018 Service

2. On September 27, 2018, my firm commenced this Chapter 15 case by filing the following documents: (a) Chapter 15 Voluntary Petition [Dkt. No. 1]; (b) Verified Petition for

¹ Schahin II Finance Company (SPV) Limited is the debtor in this chapter 15 case (the "Chapter 15 Case"). Schahin II Finance Company (SPV) Limited is a Cayman Islands exempted limited liability company with registration number 266840. The location of Schahin II Finance Company (SPV) Limited's registered office is 2nd Floor, Boundary Hall, Cricket Square, PO Box 2681, Grand Cayman, KY1-1111, Cayman Islands.

Recognition of Foreign Main Proceeding (with proposed order) [Dkt. No. 2]; (c) Application for an Order Scheduling Recognition Hearing (with proposed order and proposed notice form) [Dkt. No. 6] (referred to herein as the "Application"); (d) Declaration of Kevin Butler in Support of Petition for Recognition of Foreign Main Proceeding (with exhibits) [Dkt. No. 3] (referred to herein as the "Butler Declaration"); (e) Declaration of Ben Hobden as Cayman Islands Counsel in Support of Petition for Recognition of Foreign Main Proceeding [Dkt. No. 4]; and (f) Declaration of John S. Mairo in Support of Petition for Recognition of Foreign Main Proceeding (with exhibits) [Dkt. No. 5] (collectively, the "Chapter 15 Documents").

3. On September 27, 2018, I caused the Chapter 15 Documents to be served upon the following parties, which are defined in the Application as the Notice Parties, via both Federal Express and email:

Conyers Dill & Pearman
2nd Floor, Boundary Hall
Cricket Square, PO Box 2681
Grand Cayman, KY1-1111, Cayman Islands
(Attn: Ben Hobden)
Ben.Hobden@conyersdill.com
Cayman Island Counsel to the Foreign Representative and the Debtor
(via Federal Express and email)

The Office of the United States Trustee for the Southern District of New York
U.S. Federal Office Building
201 Varick Street, Suite 1006, New York, NY 10014
(Attn: Greg Zipes)
Greg.Zipes@usdoj.gov
United States Trustee's Office
(via Federal Express and email)

Davis Polk & Wardwell LLP
450 Lexington Avenue
New York, New York 10017
(Attn: Timothy Graulich, Natasha Tsiouris and Stephen Piraino)
timothy.graulich@davispolk.com
natasha.tsiouris@davispolk.com
stephen.piraino@davispolk.com

Counsel to the Indenture Trustee
(via Federal Express and email)

Richards, Layton & Finger, P.A.
920 North King Street
Wilmington, Delaware 19801
(Attn: Mark Collins)
collins@rlf.com

Counsel to Drief Drilling LLC
(via Federal Express and email)

Reynolds Frizzell LLP
1100 Louisiana Street, Suite 3500
Houston, Texas 77002
(Attn: Chris Reynolds and Solace Southwick)
creynolds@reynoldsfrizzell.com
ssouthwick@reynoldsfrizzell.com
Counsel to Plaintiffs in the Noteholder Litigation
(via Federal Express and email)

Wollmuth Maher & Deutsch LLP
500 Fifth Avenue, New York, New York 10110
(Attn: David H. Wollmuth, Ronald J. Aranoff and Adam M. Bialek)
dwollmuth@wmd-law.com
ranoff@wmd-law.com
abialek@wmd-law.com
Counsel to Plaintiffs in the Noteholder Litigation
(via Federal Express and email)

Epiq Corporate Restructuring
777 Third Avenue, 12th Floor
New York, New York, 10017
(Attn: Jane Sullivan and Geoff Zahm)
jsullivan@epiqglobal.com
gzahm@epiqglobal.com
Information and Noticing Agent
(via Federal Express and email)

The Scheduling Order

4. On October 1, 2018, the Court entered an Order Pursuant To Federal Rules Of Bankruptcy Procedure 2002(m), 2002(q), 9006(c)(1) And 9007 Scheduling Hearing On

Recognition Of Foreign Main Proceeding And Specifying Form And Manner Of Service Of Notice [Dkt. No. 7] (the "Scheduling Order").

5. Paragraph 5 of the Scheduling Order provides:

Copies of (i) the Notice; and (ii) the Notice Documents shall be served by email to the extent email addresses are available and by overnight mail or United States mail, first class postage prepaid, upon all persons and entities who are entitled to notice under Fed. R. Bankr. P. 2002(q)(1), including but not limited to the Notice Parties, promptly upon entry of this Order.

Scheduling Order, ¶5.

6. The "Notice" referenced in paragraph 5 of the Scheduled Order is defined in the Application as the "form of notice of the Recognition Hearing Date" attached to the Application as Exhibit B. Application, ¶8. The "Notice Documents" referenced in paragraph 5 of the Scheduled Order is defined in the Application as the "the Notice, the Petition (including the proposed order relating to the Petition, attached thereto as Exhibit A)" (see Application, ¶12), and the "Petition" is defined in the Application as "[t]he Verified Petition, together with the Voluntary Chapter 15 Petition [Dkt. No. 1]" (see Application, n.2).

7. Rule 2002(q) of the Federal Rules of Bankruptcy Procedure provides, in relevant part:

The clerk, or some other person as the court may direct, shall forthwith give the debtor, all persons or bodies authorized to administer foreign proceedings of the debtor, all entities against whom provisional relief is being sought under §1519 of the Code, all parties to litigation pending in the United States in which the debtor is a party at the time of the filing of the petition, and such other entities as the court may direct, at least 21 days' notice by mail of the hearing.

Fed. R. Bankr. P. 2002(q).

The Noteholder Litigation

8. Upon information and belief, and as set forth in the Butler Declaration, the only litigation pending in the United States in which the Debtor is a party at the time of filing of the petition is a lawsuit pending in the District Court of Harris County, Texas, 333rd Judicial District at case number 2017-19016, *American General Life Insurance Company, et al. v. Schahin Petróleo É Gas S.A., et al.* (the "Noteholder Litigation").

9. The parties in the Noteholder Litigation are plaintiffs, American General Life Insurance Company, American General Home Assurance Company, National Union Fire Insurance Company of Pittsburg, P.A., The United States Life Insurance Company of the City of New York (collectively, the "Plaintiffs"), and defendants, Schahin Petróleo É Gas S.A., Schahin II Finance Company (SPV) Limited, Milton Schahin, Salim Schahin, Fernando Schahin, Normura Securities International, Inc. (collectively, the "Defendants").

10. A notice of appearance on behalf of the Plaintiffs was filed in this Chapter 15 case [Dkt. No. 8] by James N. Lawlor of Wollmuth Maher & Deutsch LLP.

11. The Defendants have not appeared in this Chapter 15 case. However, most of the Defendants' last known addresses and/or registered agent addresses are contained in various documents filed with the Texas Court and detailed below:

Schahin Petróleo É Gas S.A.
c/o KPMG Corporate Finance Ltda.
Rua Arquiteto Olavo Redig de Campos 105
Torre A, 10th Floor
ZIP 04711-904
São Paulo, SP, Brazil

Schahin Petróleo É Gas S.A.
c/o CT Corporation
111 8th Avenue
New York, NY 10011

Salim Schahin
Alameda Franca, 660
São Paulo-SP
01422-002
Federative Republic of Brasil

Milton Schahin
Oliveira Pimentel Street, no. 271
São Paulo-SP
04002-010
Federative Republic of Brasil

Fernando Schahin
Alameda Campinas, 1446, Apartamento 201
São Paulo-SP
01404-000
Federative Republic of Brasil

12. Additionally, a search of Nomura Securities International, Inc. on the website for the NYS Department of State Division of Corporations revealed the addresses of its registered agent and chief executive officer as follows:

Nomura Securities International, Inc.
C/O Corporation Service Company
80 State Street
Albany, New York 12207-2543

Nomura Securities International, Inc.
Tutomu Takemura, Chief Executive Officer
Worldwide Plaza
309 West 49th Street
New York, New York 10019-7316

The October 3, 2018 Service

13. In accordance with paragraph 5 of the Scheduling Order, on October 3, 2018, I caused the Chapter 15 Filings, the Scheduling Order and the Notice to be served on the Notice Parties described in paragraph 3, *supra*, via both Federal Express and email; and on the following additional parties by the means indicated:

Schahin II Finance Company (SPV) Limited
2nd Floor, Boundary Hall
Cricket Square, PO Box 2681
Grand Cayman, KY1-1111, Cayman Islands
The Debtor
(via Federal Express)

Wollmuth Maher & Deutsch LLP
500 Fifth Avenue, 12th Floor
New York, NY 10110
(Attn: James N. Lawlor)
Jlawlor@wmd-law.com

2002 Party and Counsel to the Plaintiffs in the Noteholder Litigation (American General Life Insurance Company, American Home Assurance Company, National Union Fire Insurance Company of Pittsburgh, Pa., and The United States Life Insurance Company of the City of New York)
(via Federal Express and email)

Conyers Directors (Cayman) Ltd.
2nd Floor, Boundary Hall
Cricket Square, PO Box 2681
Grand Cayman, KY1-1111, Cayman Islands
(Attn: Kevin Butler)
Foreign Representative
(via Federal Express)

Schahin Petróleo É Gas S.A.
c/o KPMG Corporate Finance Ltda.
Rua Arquiteto Olavo Redig de Campos 105
Torre A, 10th Floor
04711-904
Sao Paulo, SP, Brazil
Defendant in the Noteholder Litigation
(via Federal Express)

Schahin Petróleo É Gas S.A.
CT Corporation
111 8th Avenue
New York, NY 10011
Defendant in the Noteholder Litigation
(via Federal Express)

Salim Schahin
Alameda Franca, 660
São Paulo-SP
01422-002

Federative Republic of Brasil
Defendant in the Noteholder Litigation
(via Federal Express)

Milton Schahin
Oliveira Pimentel Street, no. 271
São Paulo-SP
04002-010
Federative Republic of Brasil
Defendant in the Noteholder Litigation
(via Federal Express)

Fernando Schahin
Alameda Campinas, 1446, Apartamento 201
São Paulo-SP
01404-000
Federative Republic of Brasil
Defendant in the Noteholder Litigation
(via Federal Express)

Nomura Securities International, Inc.
C/O Corporation Service Company
80 State Street
Albany, New York 12207-2543
Defendant in the Noteholder Litigation
(via Federal Express)

Nomura Securities International, Inc.
Tsutomu Takemura, Chief Executive Officer
Worldwide Plaza
309 West 49th Street
New York, New York 10019-7316
Defendant in the Noteholder Litigation
(via Federal Express)

14. Rule 2002(q) of the Federal Rules of Bankruptcy Procedure has been complied with based upon the following service:

- a. The Debtor received notice by service upon the following, as described in paragraph 13, *supra*:

Schahin II Finance Company (SPV) Limited
2nd Floor, Boundary Hall
Cricket Square, PO Box 2681

Grand Cayman, KY1-1111, Cayman Islands
Debtor
(via Federal Express)

- b. All persons or bodies authorized to administer foreign proceedings of the Debtor received notice by service upon the following as described in paragraphs 3 and 13, *supra*:

Conyers Directors (Cayman) Ltd.
2nd Floor, Boundary Hall
Cricket Square, PO Box 2681
Grand Cayman, KY1-1111, Cayman Islands
(Attn: Kevin Butler)
Foreign Representative of the Debtor
(via Federal Express)

- c. There are no entities against whom provisional relief is being sought under §1519 of the Code.
- d. All parties to litigation pending in the United States in which the Debtor is a party at the time of the filing of the petition received notice by service upon the Debtor and the following as described in paragraphs 3 and 13, *supra*:

Wollmuth Maher & Deutsch LLP
500 Fifth Avenue, 12th Floor
New York, NY 10110
(Attn: James N. Lawlor)
Jlawlor@wmd-law.com
2002 Party and Counsel to the Plaintiffs in the Noteholder Litigation
(via Federal Express and email)

Schahin Petróleo É Gas S.A.
c/o KPMG Corporate Finance Ltda.
Rua Arquiteto Olavo Redig de Campos 105
Torre A, 10th Floor
04711-904
Sao Paulo, SP, Brazil
Defendant in the Noteholder Litigation
(via Federal Express)

Schahin Petróleo É Gas S.A.
CT Corporation
111 8th Avenue
New York, NY 10011
Defendant in the Noteholder Litigation
(via Federal Express)

Salim Schahin
Alameda Franca, 660
São Paulo-SP
01422-002
Federative Republic of Brasil
Defendant in the Noteholder Litigation
(via Federal Express)

Milton Schahin
Oliveira Pimentel Street, no. 271
São Paulo-SP
04002-010
Federative Republic of Brasil
Defendant in the Noteholder Litigation
(via Federal Express)

Fernando Schahin
Alameda Campinas, 1446, Apartamento 201
São Paulo-SP
01404-000
Federative Republic of Brasil
Defendant in the Noteholder Litigation
(via Federal Express)

Nomura Securities International, Inc.
C/O Corporation Service Company
80 State Street
Albany, New York 12207-2543
Defendant in the Noteholder Litigation
(via Federal Express)

Nomura Securities International, Inc.
Tsutomu Takemura, Chief Executive Officer
Worldwide Plaza
309 West 49th Street
New York, New York 10019-7316
Defendant in the Noteholder Litigation
(via Federal Express)

e. The Court directed service on the Notice Parties, which included:

Davis Polk & Wardwell LLP
450 Lexington Avenue
New York, New York 10017
(Attn: Timothy Graulich, Natasha Tsiouris and Stephen Piraino)
timothy.graulich@davispolk.com
natasha.tsiouris@davispolk.com
stephen.piraino@davispolk.com
Counsel to the Indenture Trustee
(via Federal Express and email)

Reynolds Frizzell LLP
1100 Louisiana Street, Suite 3500
Houston, Texas 77002
(Attn: Chris Reynolds and Solace Southwick)
creynolds@reynoldsfrizzell.com
ssouthwick@reynoldsfrizzell.com
Counsel to Plaintiffs in the Noteholder Litigation
(via Federal Express and email)

Wollmuth Maher & Deutsch LLP
500 Fifth Avenue, New York, New York 10110
(Attn: David H. Wollmuth, Ronald J. Aranoff and Adam M. Bialek)
dwollmuth@wmd-law.com
aranoff@wmd-law.com
abialek@wmd-law.com
Counsel to Plaintiffs in the Noteholder Litigation
(via Federal Express and email)

Office of the United States Trustee for the Southern District of New York
U.S. Federal Office Building
201 Varick Street, Suite 1006, New York, NY 10014
(Attn: Greg Zipes)
Greg.Zipes@usdoj.gov
United States Trustee's Office
(via Federal Express and email)

Conyers Dill & Pearman
2nd Floor, Boundary Hall
Cricket Square, PO Box 2681
Grand Cayman KY11111, Cayman Islands
(Attn: Ben Hobden)
Ben.Hobden@conyersdill.com
Cayman Island Counsel to the Foreign Representative and the Debtor
(via Federal Express and email)

Richards, Layton & Finger, P.A.
920 North King Street
Wilmington, Delaware 19801
(Attn: Mark Collins)
collins@rlf.com
Counsel to Drief Drilling LLC
(via Federal Express and email)

Epiq Corporate Restructuring
777 Third Avenue, 12th Floor
New York, New York, 10017
(Attn: Jane Sullivan and Geoff Zahm)
jsullivan@epiqglobal.com
gzahm@epiqglobal.com
Information and Noticing Agent
(via Federal Express and email)

15. The Scheduling Order also included in paragraph 6 additional service to be handled by the Information and Noticing Agent. A separate declaration of service will be filed by the Information and Noticing Agent with respect to that service.

I declare, under penalty of perjury, that the foregoing statements made by me are true and correct, to the best of my knowledge, information, and belief.

Dated: October 5, 2018
New York, New York

/s/ Kelly D. Curtin
Kelly D. Curtin